

10 UNITED STATES OF AMERICA,

11 Plaintiff,

No. CR 14-00175 WHA

12 v.

13 PACIFIC GAS AND ELECTRIC  
14 COMPANY,

**REQUEST FOR CRITIQUES**

15 Defendant.  
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17 The Court thanks the Monitor and PG&E for their recent reports and responses. These  
18 have important information for the public and the regulators. To assist in clarifying that  
19 information, by **DECEMBER 16 AT NOON**, the Monitor and PG&E are requested to critique  
20 each other's report/response as follows. The Monitor's report, submitted November 19, 2021,  
21 is appended hereto. Please read the other's report/response and identify those passages or  
22 portions thereof, if any, that you believe are misleading, inaccurate, incomplete, or in need of  
23 clarification and/or important to the public's understanding of the issues involved. Please  
24 reproduce those passages or portions to be critiqued along with your response.

25 PG&E should, for example, state whether it's true, as stated by the Monitor at page 45,  
26 that "multiple" times between 2019 and 2021, PG&E failed to alert all account holders in  
27 advance of impending PSPS events. For another example, PG&E should state whether it's true  
28 that "without counting projects built to the fire rebuild standard toward its annual system

1 hardening goal . . . PG&E would not have satisfied its annual system hardening WMP target  
2 for 2019 or 2020" (pages 43–44). Additionally, PG&E should clarify what it meant by the  
3 phrase "stood up" at page 24. (Possibly, it was an editing error.)

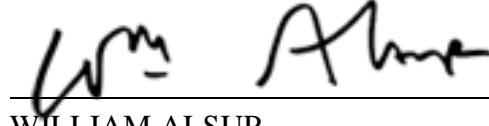
4 Please limit these critiques to 20 pages plus 10 pages of exhibits. The United States is  
5 invited to file its own critique of both reports/responses (up to the same page limits as to each)  
6 by the same date. Also, it would be useful for PG&E and the Monitor to file a separate agreed-  
7 on glossary of terms explaining in a single sentence terms like "DIRT," etc. PG&E shall file  
8 its critique as a public document. The Monitor's shall be filed publicly as well.

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10 **IT IS SO ORDERED.**

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12 Dated: November 23, 2021.

13   
14 WILLIAM ALSUP  
15 UNITED STATES DISTRICT JUDGE